

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**SOUTHERN DIVISION**

RYAN BAUGH,	*
	*
Plaintiff,	*
	*
v.	*
	CASE NO.: 2:24-cv-10036 (SKD)
	*
CENTRAL INTELLIGENCE	*
AGENCY,	HON. SUSAN K. DECLERCQ
	*
	*
Defendant.	*
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**PLAINTIFF'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME WITHIN WHICH TO FILE HIS  
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

NOW COMES Plaintiff Ryan Baugh (“Baugh”) to respectfully request a three-week enlargement of time until 7 June 2024, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, within which to file its opposition to Defendant’s Motion to Dismiss, Dkt. #10. This brief is due today, 15 May. Defendant Central Intelligence Agency (“CIA”) does not oppose this Motion.

Baugh has good cause to request this extension. On 10 May, he filed a motion requesting a stay of the briefing of Defendant’s motion to dismiss pending resolution of two procedural motions which will be filed this week. CIA opposed that motion, and CIA’s counsel confirmed to the undersigned today that it intends

to file a formal opposition. This has put Baugh in an untenable position. Filing his opposition to CIA's motion to dismiss today as scheduled would render the motion to stay moot and cause the very harm the motion to stay was filed to prevent, but not filing it today would be a gamble that the Court would not sanction him for not adhering to a deadline if it ultimately denied the motion to stay. Accordingly, after consulting with CIA's counsel, Baugh requests this extension, which will make his opposition to CIA's motion to dismiss due a week after briefing has concluded on the motion to stay. This will ideally allow the Court sufficient time to adjudicate that motion before Baugh is required to file his opposition.

Date: May 15, 2024

Respectfully submitted,

/s/ Kelly B. McClanahan  
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*Counsel for Plaintiff*